

Presentment Date and Time: November 27, 2017 at 4:00 p.m.
Objection Deadline: November 21, 2017 at 4:00 p.m.

ROPES & GRAY LLP
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**NOTICE OF PRESENTMENT OF STIPULATION AND ORDER
BETWEEN THE PLAN ADMINISTRATOR AND ALBERT JAMES
DAULERIO REGARDING PROOFS OF CLAIM NOS. 293, 294 AND 295**

PLEASE TAKE NOTICE that Albert James Daulerio (“Mr. Daulerio”) filed Claim Nos. 293, 294, and 295 (collectively, the “Daulerio Claims”) in the chapter 11 cases filed by Gawker Media LLC (“Gawker Media”), Gawker Media Group, Inc. (“GMGI”), and Gawker Hungary Kft. (“Gawker Hungary” and together with Gawker Media and GMGI, the “Debtors”);

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Plan Administrator, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

PLEASE TAKE FURTHER NOTICE that the Daulerio Claims allege claims for liability resulting from the Debtors' duty to defend and indemnify Mr. Daulerio in connection with the judgment entered on June 7, 2016 in the suit by Terry Gene Bollea ("Bollea") and the proceedings relating to additional pending and potential lawsuits by Bollea against Mr. Daulerio (collectively, the "Daulerio Claims");

PLEASE TAKE FURTHER NOTICE that on November 28, 2016, the Debtors filed the *Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 Filed by Albert James Daulerio* [Docket No. 493] (the "Objection");

PLEASE TAKE FURTHER NOTICE that the parties have entered into the stipulation and order attached hereto as Exhibit A in respect of the Daulerio Claims and the Objection (the "Stipulation and Order");

PLEASE TAKE FURTHER NOTICE that, absent objections, the undersigned will present the Stipulation and Order for signature to the Court on **November 27, 2017 at 4:00 p.m.**; and

PLEASE TAKE FURTHER NOTICE that responses or objections to the Stipulation and Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and

served so as to be actually received no later than **November 21, 2017 at 4:00 p.m.** (prevailing Eastern Time), upon (i) the Plan Administrator for the Debtors, Attn: William D. Holden (profinvoices@gawker.com); (ii) counsel to the Plan Administrator for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi (gregg.galardi@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) counsel for the IRS, Andrew E. Krause, United States Attorney's Office Southern District of New York, 86 Chambers Street, 3rd Floor, New York, New York 10007; and (v) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002.

Dated: November 7, 2017
New York, New York

/s/ Gregg M. Galardi
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